

Direct Line 020 7208 2029
Mobile 07803 513759
Fax 020 7208 2024
E-mail mike.ibbott@tpbennett.com

tp bennett

24 January 2023

Adam Greenhalgh
Planning Officer
London Borough of Camden
Planning Department
Camden Town Hall
London
WC1H 8ND

Dear Adam

**PROPOSAL FOR CHANGE OF USE TO HOTEL AND CREATION OF OPENINGS
INTO NEIGHBOURING HOTEL
AT: 118-120 HIGH HOLBORN LONDON WC1V 6RD
LBC REFS: 2022/1386/P AND 2022/1915/L**

I refer to the above applications proposing the creation of openings at basement and ground floor level to link new hotel floorspace in 118-120 High Holborn with the adjoining L'Oscar Hotel at 2-6 Southampton Row (which is Grade 2* listed). The applications have been held in abeyance for some time to consider concerns raised by the LBC Conservation Officer, Colette Hatton, regarding what she saw as the unacceptable "lateral conversion" of the properties.

We previously submitted some revisions (letter dated 9 November 2022) based on evidence of a number of openings between the two buildings in the past, at basement, ground and first floor levels. In your email of 21 December 2022, however, you stated that the fact of a previous lateral opening at GF was not sufficient to allow one now; your judgment was that it would harm the plan form of the building and therefore the significance of the building. Rather you suggested the room should remain intact with an opening to the rear of the room being allowable given a previous application had done so.

I accordingly submit further revised drawings to accord with this advice, as follows:

- revised core layout (with single lift) – handed in order to access the lift at GF with minor changes from B to 1F only
- relocation of GF connecting jib door within 2-6 Southampton Row to the eastern corner of the room, its precise position reflecting the need to allow access to the lift;
- revised layout of basement spa/wellbeing space; proposed connecting door with 2-6 Southampton Row unchanged
- use of the GF as wellbeing centre in association with basement use and also accessible externally
- use of the mezzanine for wellbeing/spa (not a hotel bedroom)

Revised drawings are provided accordingly; there are no changes to elevations (see drawing schedule below). The application descriptions are not altered.

Drawing title/description	Drawing no	
	As submitted/ previously revised	As amended
Site location plan	A11566 F0002 P1	No change
<i>Existing floor plans and elevations:</i>		
Basement	A11566 F 0099 P1	No change
GF	A11566 F 0100 P1	No change
Mezzanine	A11566 F 0110 P1	No change
1F	A11566 F 0101 P1	No change
2F	A11566 F 0102 P1	No change
3F	A11566 F 0103 P1	No change
4F	A11566 F 0104 P1	No change
5F	A11566 F 0105 P1	No change
Roof	A11566 F 0106 P1	No change
West elevation	A11566 F 0201 P1	No change
South elevation	A11566 F 0202 P1	No change
<i>Proposed floors plans and elevations:</i>		
Basement	A11566 D 0099 P3	A11566 D 0099 P4
GF	A11566 D 0100 P3	A11566 D 0100 P5
Mezzanine	A11566 D 0110 P2	A11566 D 0110 P3
1F	A11566 D 0101 P2	A11566 D 0101 P3
2F	A11566 D 0102 P2	No change
3F	A11566 D 0103 P2	No change
4F	A11566 D 0104 P2	No change
5F	A11566 D 0105 P2	No change
Roof	A11566 D 0106 P2	No change
West elevation	A11566 D 0201 P3	No change
South elevation	A11566 D 0202 P3	No change

Existing and proposed openings ground floor and basement	A11566 D0210 P3	A11566 D0210 P4
Ground floor existing and proposed opening montage	A11566 D0211 P2	withdrawn
<i>Demolition plans:</i>		
Basement	A11566 Z 0099 P1	No change
GF	A11566 Z 0100 P3	A11566 Z 0100 P4

As previously outlined, the extant permission shows a connection at both basement and ground floor levels to enable 118-120 High Holborn to be utilised in conjunction with the neighbouring hotel. The submitted Design and Access/Planning Statement (as amended 7 July 2022) sets out the strong policy support for the proposal in terms of use and design.

In relation to heritage, Policy D2 of the CLP essentially repeats the advice and relevant tests set out in the NPPF (2021). Of most relevant here is para 202:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

It is agreed by the Conservation Officer that the proposal would result in “less than substantial harm” to the significance of the heritage interest. This is particularly the case at basement level where the new opening provides back of house access to the new spa space and lift core. At GF the revised position of the jib door opening is now in virtually the same location as has previously been consented, presumably on the basis that any harm to the significance of the heritage asset was outweighed by public benefits.

As previously noted, the public benefits of the current proposal are as follows:

- first, the proposal will bring the vacant building at 118-120 High Holborn back into active use, including at basement level
- second, it will help to activate the publicly-accessible GF of the hotel and the corner, including retention of the existing corner entrance
- third, the building is assessed as making a positive contribution to the character of the Conservation Area in the Conservation Area Statement 2001 (where it is described as 119 and 120 High Holborn originally the London Joint Stock Bank) – its refurbishment and repair will enhance the character and

Direct Line 020 7208 2029
Mobile 07803 513759
Fax 020 7208 2024
E-mail mike.ibbott@tpbennett.com

tp bennett

appearance of the Kingsway Conservation Area on this prominent corner location

I trust this will now enable the applications to be considered favourably and move swiftly to a positive determination.

Yours sincerely,

Mike Ibbott
Director
for **tp bennett**